

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEROME K. HAMILTON, a/k/a
ELOHIM CHEIKH AHMED,

Plaintiff,

v.

CATHY L. GUESSFORD, REBECCA
MCBRIDE, ROBERT F. SNYDER, THOMAS
L. CARROLL, and STANLEY W. TAYLOR,
JR.

Defendants

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C.A. No. 04-1422 (GMS)

JURY TRIAL DEMANDED

PLAINTIFF'S REQUEST FOR PRODUCTION DIRECTED TO ALL DEFENDANTS

The Plaintiff requests the Defendants, pursuant to Rule 34, Federal Rules of Civil Procedure, to produce for examination and copying at the offices of the attorney for the Plaintiff within thirty (30) days of the date of service hereof the following items:

1. Copies of all grievance files of the plaintiff, Jerome Hamilton from January 1, 1999 to the date of his release, such documents to include the grievance itself, and all documents utilizing or evidencing a response to the grievance and/or resolution of ghre grievance.

RESPONSE

2. All documents relating to, or pertaining to the calculation of the plaintiff's release date, at any time from January 1, 1990 to the date of his release.

RESPONSE

3. The job descriptions of each defendant for the years 1999 through the date of release of the plaintiff.

RESPONSE

4. Copies of documents, letters, memorandum, emails, relating to or pertaining to the calculation of the plaintiff's release date by and among the defendants.

RESPONSE

5. Copies of documents, letters, memorandum, emails, relating to or pertaining to the calculation of the plaintiff's release date by and between the Attorney General's Office of the State of Delaware.

RESPONSE

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber

GARY W. ABER (DSB #754)

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302-472-4900

Attorney for Plaintiff

DATED: June 7, 2006

